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6 *Counsel for Plaintiffs*

7 **UNITED STATES DISTRICT COURT**
 8 **NORTHERN DISTRICT OF CALIFORNIA**
 9 **SAN FRANCISCO DIVISION**

10 IN RE: UBER TECHNOLOGIES, INC.,
 11 PASSENGER SEXUAL ASSAULT
 12 LITIGATION

13 MDL No. 3084 CRB

14 Honorable Charles R. Breyer

15 This Document Relates to:

**MOTION TO WITHDRAW AS COUNSEL
 OF RECORD FOR PLAINTIFFS P.T. AND
 S.W. ONLY**

16 *R.L. vs. Uber Technologies, Inc., et al.,*
 17 *3:25-cv-05515;*

18 *P.T. vs. Uber Technologies, Inc., et al.,*
 19 *3:25-cv-05677; and*

20 *S.W. vs. Uber Technologies, Inc., et al.,*
 21 *3:25-cv-06329*

22 Pursuant to Local Rule 11-5, D. Douglas Grubbs of Pulaski Kherkher, PLLC, counsel
 23 of record (“Counsel”) for the above-referenced Plaintiffs, respectfully moves this Court for an
 24 Order allowing his firm to withdraw as counsel of record for Plaintiffs P.T. and S.W. Counsel
 25 does not seek withdrawal from Plaintiff R.L. as explained below.

26 Prior to Defendants filing their third show cause motion [ECF 4137], Counsel met and
 27 conferred with opposing counsel on October 7, 2025 to discuss the three additional “non-bona-
 28 fide receipts” that the above-referenced Plaintiffs previously provided to Counsel. After
 reviewing the ride receipts with opposing counsel, Counsel advised his firm’s intention to
 withdraw as counsel of record should the above-referenced Plaintiffs fail to provide additional

1 ride receipt proof. Relying on opposing counsel's representations asserted during the meet and
2 confer, Counsel contacted the above-referenced Plaintiffs via email the same day. Counsel
3 informed Plaintiffs of Defendants' concerns and requested that Plaintiffs provide any additional
4 proof of their ride at issue, *e.g.*, the summary email that Uber typically sends upon ride
5 completion. Counsel further attempted contacting the above-referenced Plaintiffs via telephone
6 on October 8 and 14, 2025. Upon Defendants filing their third show case motion [ECF 4137],
7 Counsel sent follow-up emails to the above-referenced Plaintiffs on October 14, 2025 as well as
8 mailed correspondence via 2-day Federal Express giving Plaintiffs until October 22, 2025 to
9 provide any additional proof otherwise Counsel would initiate the process of withdrawing as
10 their attorneys. As required by Local Rule 11-5(a), Counsel has provided written notice of
11 Counsel's intent to withdraw, reasonably in advance, to the above-referenced Plaintiffs as well
12 as notice to opposing parties.
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14 At the time of filing this motion to withdraw, no additional ride receipt proof has been
15 provided by Plaintiffs P.T. or S.W. nor substitute counsel identified. However, on October 23,
16 2025, Plaintiff R.L. contacted Counsel and provided the ride summary emailed directly from
17 Uber. Counsel immediately uploaded said receipt to MDL Centrality and emailed opposing
18 counsel a courtesy copy of the additional ride proof. Counsel intends to proceed with R.L.'s
19 action against Defendants and does not intend to withdraw as counsel of record at this time.
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21 WHEREFORE, the attorneys and law firm of Pulaski Kherkher, PLLC respectfully
22 request that they be allowed to withdraw as counsel of record for Plaintiffs P.T. and S.W. A
23 courtesy copy of this motion will be served upon Plaintiffs P.T. and S.W. at their last known
24 address and via electronic mail.
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1 Dated: October 24, 2025

Respectfully submitted,

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3 **PULASKI KHERKHER, PLLC**

4 /s/ D. Douglas Grubbs

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10 Counsel for Plaintiffs

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on October 24, 2025, I electronically transmitted the foregoing MOTION
3 TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for
4 filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the
5 foregoing was served on Defendants' counsel via email at: ubermdlservice@listserv.shb.com.
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8 */s/ D. Douglas Grubbs*
9 D. Douglas Grubbs
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